# **EXHIBIT K**

#### STATE OF MICHIGAN MACOMB COUNTY CIRCUIT COURT



NATALIE REESER Plaintiff,

Fax: (248) 358-4877

v.

CASE NO: 09-1589-CD HON.: Diane Druzinski

JEFFREY AUTOMOTIVE GROUP, LLC, JEFFREY BUICK-NISSAN, INC., CHRISTINA BRIGGS, AND CHRISTOPHER BROADNAX Defendants.

Law Offices of Nanette L. Korpi, P.L.C. Nanette L. Korpi, Esq. (P43049) Attorney for Plaintiff 29820 Telegraph Road Southfield, MI 48034 Tel: (248) 358-1747



### MOTION OF LAW OFFICES OF NANETTE L. KORPI, P.L.C. TO WITHDRAW AS ATTORNEYS FOR PLAINTIFF NATALIE REESER

Now comes the Law Offices of Nanette L. Korpi, P.L.C. and for this its Motion to Withdraw as Attorneys for Plaintiff Natalie Reeser states as follows:

- This case arises out of the termination of Natalie Reeser's employment by the Jeffery Automotive car dealership.
- In discussing and analyzing the case it has become clear that Plaintiff Natalie
  Reeser and her attorneys the Law Offices of Nanette L. Korpi, P.L.C. have a
  difference in opinion regarding the exposure and potential value of Ms. Reeser's
  case.
- 3. The difference in opinion regarding Plaintiff's case between Ms. Natalie Recser and the Law Offices of Nanette L. Korpi, P.L.C. will make it very difficult for the Law Offices of Nanette L. Korpi, P.L.C. to continue with the representation of



Ms. Reeser and to fulfill its obligations to communicate with Ms. Reeser as set

forth in the Michigan Rules of Professional Conduct 1.4.

4. Michigan Rules of Professional Conduct allow a lawyer to withdraw from

representation of a client if there is no material adverse affect on the interest of

the client and if good cause for withdrawal exists.

5. In the instant case, good cause for withdrawal exists in that Plaintiff Natalie

Reeser and the Law Offices of Nanette L. Korpi, P.L.C., after review and analysis

of the case have a difference of opinion regarding strategy and evaluation of Ms.

Reeser's matter.

6. Further, this withdraw will not be materially adverse to Ms. Reeser. This case is

only recently been filed and is in the very early stages. Ms. Reeser has been

informed by the Law Offices of Nanette L. Korpi, P.L.C. that there has arisen a

difference of opinion and she needs to seek new counsel. See Exhibit 1. Given the

fact that the case is relatively recent Ms. Reeser has ample opportunity to seek

new counsel.

WHEREFORE, the Law Offices of Nanette L. Korpi, P.L.C. respectfully request this

Honorable Court grant their Motion to Withdraw as Attorneys for Plaintiff Natalie Reeser.

Respectfully Submitted,

Law Offices of Nanette L. Korpi, PLO

By:

Nanette L. Korpi (43049)

29820 Telegraph Road-Southfield, MI 48034

(248) 358-1747

Dated: May 19, 2009

## THE LAW OFFICES OF NANETTE L. KORPI, P.L.C. Attorneys and Counselors at Law

Nanette L. Korpi, Esq.

#### Main Office

29820 Telegraph Road Southfield, Michigan 48034 (248) 358-1747- Phone (248) 358-4877- Fax

May 6, 2009

Ms. Natalie Reeser 31865 Nardelli Roseville, MI 48066

Dear Ms. Reeser:

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CARMELLA SABAUGH

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This letter is pursuant to our telephone conversation of May 5, 2009. In that conversation, you had discussed with me that you believed that your case had a high settlement value based upon the information which you had against Jeffery Automotive and you were looking to obtain approximately \$150,000.00. As I explained to you, in my opinion there are certain issues with your case, including the need to prove that your termination was based in whole or in part on your refusal to falsify documents rather than any other reason.

As we discussed, we do have a disagreement regarding our opinions of your case and the likely value of your case. As I explained to you, because of this difference in opinion I find it necessary to exercise the rights under the Agreement for Legal Service and inform you that the Law Offices of Nanette L. Korpi, P.L.C. will be withdrawing from your representation. I will be filing a Motion to Withdraw to be heard by the Judge in your case Diane Druzinski on May 26, 2009. At that time I will be requesting that Judge Druzinski allow my offices to withdraw from the representation and to allow you adequate time to find a new attorney.

As we discussed, the Complaint in your matter has been filed in the Macomb County Circuit Court naming as Defendant Christopher Broadnax, Christina Briggs, Jeffery Automotive Group, LLC and Jeffery Buick Nissan, Inc. As I explained to you, the Summons will expire on July 6, 2009 meaning the Defendants will need to be served with Summons and Complaint before that date. I had asked if you wanted my offices to serve this Summons in order to ensure that they were served prior to July 6, 2009. You instructed me that you did not want my offices to serve the Summons since you will be in the process of seeking a new attorney. I am also returning to you, all materials, including notes in your file. I am retaining copies of all of these materials for my records.

I would advise that you begin seeking a new attorney as soon as possible in order not to miss any deadlines, including the July 6, 2009 deadline.

Ms. Natalic Reeser Page 2 of 2

There was a charge in your case of \$235.00 to file the Complaint and I am enclosing a copy of the receipt for the filing fee. There is also a charge of \$16.70 (334 copies at .05 cents per page) for the copies of your file. Please send a check for \$251.70 to my offices upon receipt of this letter.

Thank you for your attention to this matter.

Very unity yours

Nanette L. Korpi, Esq.

Law Offices of Nanette L. Korpi, P.L.C.

NLK/mlp-

### STATE OF MICHIGAN MACOMB COUNTY CIRCUIT COURT

NATALIE REESER

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Plaintiff,

CASE NO.:09-1589-CD

HON.: Diane Druzinski

JEFFREY AUTOMOTIVE GROUP, LLC, JEFFREY BUICK-NISSAN, INC., CHRISTINA BRIGGS, AND CHRISTOPHER BROADNAX Defendants.

Law Offices of Nanette L. Korpi, P.L.C. Nanette L. Korpi, Esq. (P43049)

Attorney for Plaintiff

29820 Telegraph Road

Southfield, MI 48034 Tel: (248) 358-1747

Fax: (248) 358-4877

## BRIEF IN SUPPORT OF LAW OFFICES OF NANETTE L. KORPI, P.L.C.'S MOTION TO WITHDRAW AS ATTORNEYS FOR PLAINTIFF NATALIE REESER

Now comes the Law Offices of Nanette L. Korpi, P.L.C. and for this its Brief in Support of Law Offices of Nanette L. Korpi, P.L.C.'s Motion to Withdraw as Attorneys for Plaintiff Natalie Reeser states that it relies upon the facts and law as more fully set forth in Law Offices of Nanette L. Korpi, P.L.C.'s Motion to Withdraw as Attorneys for Plaintiff Natalie Reeser.

WHEREFORE, the Law Offices of Nanette L. Korpi, P.L.C. respectfully request this Honorable Court grant their Motion to Withdraw as Attorneys for Plaintiff Natalic Reeser.

Respectfully Submitted,

Law Offices of Nanette L, Korpi, PLC

By:

Nanette L. Korpi (43049)

29820 Telegraph Road Southfield, MI 48034

(248) 358-1747

Dated: May 19, 2009

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### STATE OF MICHIGAN MACOMB COUNTY CIRCUIT COURT

NATALIE REESER

Plaintiff,

v.

CASE NO.: 09-1589-CD HON.: Diane Druzinski

JEFFREY AUTOMOTIVE GROUP, LLC, JEFFREY BUICK-NISSAN, INC., CHRISTINA BRIGGS, AND CHRISTOPHER BROADNAX Defendants.

Law Offices of Nanette L. Korpi, P.L.C. Nanette L. Korpi, Esq. (P43049) Attorney for Plaintiff 29820 Telegraph Road Southfield, MI 48034 Tel: (248) 358-1747

PROOF OF SERVICE

Now comes the undersigned and states that she caused the Law Offices of Nanette L. Korpi, P.L.C.'s Motion to Withdraw as Attorneys for Plaintiff Natalie Reeser, Brief in Support of Law Offices of Nanette L. Korpi, P.L.C.'s Motion to Withdraw as Attorneys for Plaintiff Natalie Reeser, Notice of Hearing and this Proof of Service to be hand delivered to:

Ms. Natalie Reeser 31865 Nardelli

Fax: (248) 358-4877

Roseville, MI 48066

Nanette L. Khapi, Esq.

Dated: May 19, 2009

### STATE OF MICHIGAN MACOMB COUNTY CIRCUIT COURT

NATALIE REESER

Plaintiff,

CASE NO.: 09-1589-CD

v.

HON.: Diane Druzinski

JEFFREY AUTOMOTIVE GROUP, LLC, JEFFREY BUICK-NISSAN, INC., CHRISTINA BRIGGS, AND CHRISTOPHER BROADNAX Defendants.

Law Offices of Nanette L. Korpi, P.L.C. Nanette L. Korpi, Esq. (P43049)

Attorney for Plaintiff 29820 Telegraph Road Southfield, MI 48034

Tel: (248) 358-1747 Fax: (248) 358-4877

#### NOTICE OF HEARING

Please take notice that the Law Offices of Nanctte L. Korpi, P.L.C.'s violation to Withdraw as Attorneys for Plaintiff Natalie Reeser will be heard before the Honorable Diane Druzinski on Tuesday, Druži, 2009 at 8:30 a.m. or as soon thereafter as counsel may be heard.

Respectfully Submitted,

Law Offices of Nanette L. Korpi, PLC

By:

Nanette L. Korpi (43049) 29820 Telegraph Road Southfield, MI 48034 (248) 358-1747

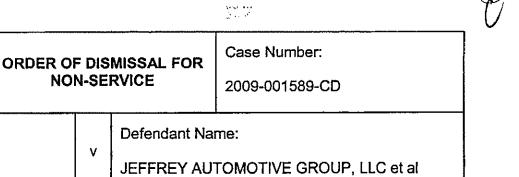
Dated: May 19, 2009

STATE OF MICHIGAN CV-11916-GCS-SDD ECF No. 71-12, PageID.2172 Filed 03/07/16 Page 9 of 10 **COUNTY OF MACOMB ORDER CIRCUIT COURT** 

09-1589-cd

Natalie Reeser	Plaintiff(s)	Attornev:	Nanette L. Korpi	P# <b>43049</b>
VS	_ 1 / (1/1/1/1/(0)	, mornoy.		
Jeffrey Automotive Grpup, LLC	_ Defendant(s)	Attorney:	- A - C. S.	P#
At a session of the Court, held on	June 1, 2	2009		
ORDER OF WITHDRAWAL OF COUNSEL  Title of Order				
IT IS ORDERED:				09
The Law Offices of Nanette L. Korpi, PLC's Motion to Withdraw as counsel for plaintiff Natalie Reeser is granted. No status conference has been set since Defendants have not been served with the Complaint. Natalie reeser's last known address and phone number is 31865 Nardelli Roseville, MI 48066, phone number 586-843-6020				
Approved as to form and substance by:	¢60g	DIM DIANE M. I	Mymynd Družinski	CIRCUIT JUDGE
Signature of attorney(s) for plaintiff(s)		Signat	ure of attorney(s) for defe	endant(s)
Signature of attorney(s) for plaintiff(s)		Signat	ure of attorney(s) for defe	endant(s)

CIVIL/CRIMINAL DIVISION



Phone: (586) 469-5133

40 N. Main Mt. Clemens, MI 48043

STATE OF MICHIGAN

COUNTY OF MACOMB

Plaintiff Name:

NATALIE REESER

16TH JUDICIAL CIRCUIT COURT

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The court records disclose that the defendant(s) have not been timely served with process according to court rule MCR 2.102(E)(2).

IT IS ORDERED that this case is dismissed without prejudice as to all parties.

Date: 7/22/09 DIANE M DRUZINSKI

Circuit Judge